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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

In re
JOHN M. GUERIN AND AMY L. GUERIN,
Debtors.

JPMORGAN CHASE BANK, NATIONAL
ASSOCIATION, and its successors and/or
assignees,

Movant,

vs.

JOHN M. GUERIN AND AMY L. GUERIN,
Debtors, and Martha G. Bronitsky, Trustee,

Respondents.

Bankruptcy Case No. 10-47680

RS No. ETL-912

Chapter 13

**JPMORGAN CHASE BANK'S MOTION FOR
RELIEF FROM AUTOMATIC STAY**

HEARING DATE:

DATE: JULY 13, 2011

TIME: 10:30 A.M.

CTRM: 220

**TO THE HONORABLE WILLIAM J. LAFFERTY, UNITED STATES BANKRUPTCY
COURT JUDGE, THE DEBTORS, THE DEBTORS' COUNSEL, THE TRUSTEE AND
OTHER INTERESTED PARTIES:**

JPMORGAN CHASE BANK, NATIONAL ASSOCIATION, and its successors and/or
assignees ("JPMORGAN CHASE BANK"), hereby moves this Court for an order terminating the
automatic stay of 11 U.S.C. §362 as to Movant in the above-entitled and numbered case so that Movant
may commence and continue acts necessary to enforce its security interest in real property commonly
known as 3544 HILLSBOROUGH DRIVE, CONCORD, CA 94520.

Debtors in the above numbered Chapter 13 Case has failed to make post-petition

1 payments.

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3 This Motion is based upon the attached Declaration and the Memorandum of Points and
4 Authorities attached hereto, as well as upon the documents filed in support of the Motion.

5 DATED: June 22, 2011

Respectfully Submitted,

6 MALCOLM ♦ CISNEROS, A Law Corporation

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8 By: /s/ Erica T. Loftis
9 ERICA T. LOFTIS
Attorneys for Movant